

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT	)	
FUNDS OF ILLINOIS, <i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 10 C 6357
vs.	)	
	)	JUDGE JOAN H. LEFKOW
CARSWELL'S FLOORING, INC., an	)	
Illinois corporation, a/k/a CARSWELL	)	
FLOORS,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, CARSWELL'S FLOORING, INC., an Illinois corporation, a/k/a CARSWELL FLOORS, in the total amount of \$19,222.23, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$3,367.50.

On October 11, 2010, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to the corporation's President, William A. Scheitlin) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on November 1, 2010. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 26th day of April 2011:

Ms. Katherine A. Jablononowski, Registered Agent  
Carswell's Flooring, Inc.  
14N754 Lac Du Beatrice  
Dundee, IL 60118

Mr. William A. Scheitlin  
Carswell's Flooring, Inc.  
225 E. Chicago Street  
Elgin, IL 60120-6558

/s/ Patrick N. Ryan \_\_\_\_\_

Patrick N. Ryan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6278364  
Telephone: (312) 236-4316  
Facsimile: (312) 236-0241  
E-Mail: [pryan@baumsigman.com](mailto:pryan@baumsigman.com)